

E. W. (Bill) Baragar
Vice President & Deputy
Washington, DC Operations

The Boeing Company
1200 Wilson Boulevard MC RS-00
Arlington, VA 22209

December 4, 2001

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 Twelfth St., S.W.
Washington, DC 20554

Dear Chairman Powell:

The Boeing Company has a wide range of interests in the consideration of radio transmission devices utilizing ultra-wideband (UWB) technologies. As the world's largest manufacturer of commercial and military aircraft, Boeing and its customers are major users of radio spectrum that could be subject to harmful interference, either from individual or multiple UWB devices. Protecting all critical global aviation safety services is of paramount importance to Boeing, our customers, and to the flying public.

Boeing is also a global leader in the design, construction and launch of space systems and satellites, including the Global Positioning System (GPS). Because GPS supports critical aviation safety services as well as national security objectives, its protection from harmful interference must be a prerequisite to the operation of UWB devices. If sufficient safeguards and conditions cannot be established to ensure protection of GPS, aviation, and other existing critical, safety of life spectrum users, then UWB devices should not be authorized to operate in these frequency bands.

Boeing is very interested in UWB technology and is also involved in Department of Defense contracts that include the evaluation of UWB technologies. Nevertheless, Boeing shares the concerns expressed by Deputy Secretary of Defense Wolfowitz in his November 20, 2001 letter to Secretary of Commerce Evans regarding the harmful interference potential of UWB technologies to DoD systems.

Boeing has participated in recent meetings with the Federal Communications Commission and understands that the Commission may authorize UWB under its Part 15 rules using a "conservative approach." However, data from reliable studies do not demonstrate that the power limitations of Part 15 alone are adequate to ensure that UWB devices will not interfere with GPS and other safety of life services. Therefore, Boeing stands by its previous position, provided in comments to the Federal Communications Commission, that a final rule



permitting authorization of any UWB devices on an unlicensed basis under Part 15 of the Commission's rules should not be issued.

Instead, Boeing recommended the Commission adopt a conditional licensing structure to resolve any unanticipated interference concerns in a manner that is currently unavailable under Part 15.

I encourage you to seek the additional time needed to adequately work through these issues. Doing so should enable a common solution that protects critical, safety of life systems, such as GPS, from potential harmful interference caused by an uncontrolled ubiquitous deployment of UWB devices.

We are always available to provide additional information, and your consideration of this very important matter is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read 'E.W. Baragar', with a stylized, flowing script.

E.W. Baragar

cc: The Honorable Donald L. Evans
Secretary of Commerce

The FCC Commissioners and Legal Advisors

